

CHRONOLOGY OF LDL COASTAL LIMITED, L.P. ACTIVITIES AT GULFCO MARINE MAINTENANCE SITE AND COMMUNICATIONS WITH THE STATE AND EPA REGARDING THE SITE

1971 to May 1998	Property used for barge cleaning operations by three owner/operators: GulfcO Marine Maintenance, Inc/Chromalloy American Corporation (1971 to 1979); Fish Engineering & Construction, Inc. (1979-1989) and Hercules offshore Drilling Company/Hercules Marine Service Corporation (1989- May 1998).
May 1998	Hercules Marine Services Corporation, the last owner/operator, into Chapter 7 bankruptcy.
October 1998	The TNRCC, through the Attorney General's Office, filed and pursued a claim for cleanup of the site.
February 22, 1999	TNRCC letter from Region 12-Houston to Wes Newberry (Site Discovery & Assessment) referring the site to Superfund Assessment Section.
March 1999	LT Environmental, Inc. ("LTE") conducted investigation activities at the Site and issued a report in June 1999 recommending certain removal and remedial activities to LDL Coastal. (This is the LTE Report)
June 11, 1999	Letter from Glenn Hall to Allen Daniels explaining information about Hercules Marine's Air, Solid Waste and Petroleum Storage Tank accounts and files at the TNRCC. Mr. Hall pointed out in letter that there will likely be remedial activities required at the site, and says the TNRCC will be glad to meet with his client to discuss the scope of any required remedial activities and the mechanism for conducting these activities.
August 2, 1999	LDL Coastal Limited, L.P. purchased 35 acres of the site out of Hercules bankruptcy.
September 1999	LDL had a significant amount of drummed material removed from the site: Working through Pelican Environmental Services LDL disposed of drums of hazardous waste on the site. LDL also disposed of drums containing non-hazardous waste. LDL removed certain metal buildings and the dry-dock located on the site.
January 4, 2000	TNRCC (Allan Seils) sends copies of all official archived State records, including title documents and owner and/or operator records to EPA, Janice Bivens in Cost Recovery Section.
January 11, 2000	TNRCC sends Notification to Perform Site Screening Inspection to LDL Coastal, in care of Allen Daniels. Informs of inspection under CERCLA and asks for Consent for Access to Property.

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January 20, 2000 LDL Coastal faxes its signed Consent for Access to Property to John Kennedy at the TNRCC. Consent noted that actions were taken pursuant to CERCLA.

January 25-27, 2000 TNRCC conducted the Screening Site Inspection (“SSI”).

August 21, 2000 TNRCC (Allan Seils) sends draft SSI Report and pre-score to EPA Superfund Site Assessment Team.

January 4, 2001 TNRCC sends Notification to Perform Expanded Site Inspection to LDL Coastal, in care of Allen Daniels. Informs of expanded inspection under CERCLA and asks for Consent for Access to Property.

January 11, 2001 LDL Coastal sends signed Consent for Access to Property to Wesley Newberry at the TNRCC. Consent noted that actions were taken pursuant to CERCLA. Mr. Daniels asks for a copy of TNRCC’s final report and interim reports.

January 22-26, 2001 TNRCC conducted the Expanded Site Inspection at the site.

March 26, 2001 TNRCC Field Activity Report issued explaining January field activities.

August 23, 2001 TNRCC (Jeff Saitas) sends letter to Governor Perry seeking Governor’s concurrence on proposing the site to the National Priorities List (“NPL”).

Later in August 2001 Billy Phenix of Governor Perry’s Office asked whether the landowner had been notified and been given a chance to cleanup the property before the site is referred for listing (Email dated Monday, August 27, 2001).

E-mail from Kelly Cook to D. Davis and 9/7/01 E-mail from Kelly Cook to D. Davis TNRCC replies that: The Access Agreement had referred to CERCLA The Owner would have the opportunity to cleanup the property once it was listed.

December 13, 2001 Governor Perry requested that EPA list the site.

February 2002 Hazardous Ranking System Documentation Record issued.

September 5, 2002 Site proposed for listing in the Federal Register.

November 4, 2002 Comment period closes on proposed Listing

March 11, 2003	EPA sends to LDL Coastal a Notice of Potential Liability and 104(e) Information Request.
April 30, 2003	Final Notice of Listing on the NPL.
May 12, 2003	LDL responds to EPA's general notice letter and information request.
July 22, 2004	EPA sends Special Notice Letter to LDL.
September 24, 2004	LDL responds to EPA's Special Notice Letter.